

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WILLIAM BRIDGE, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

CREDIT ONE FINANCIAL, a Nevada  
Corporation d/b/a CREDIT ONE BANK,  
N.A.

Defendant.

MISC. CASE NO.: \_\_\_\_\_

(District of Nevada Case No.: 2:14-cv-01512-  
LDG-NJK)

**NOTICE OF MOTION TO QUASH SUBPOENA**

TO: Leonard H. Stone, Esq.  
Shook & Stone, CHTD.  
710 S. Fourth Street  
Las Vegas, Nevada 89101  
[lstone@shooandstone.com](mailto:lstone@shooandstone.com)

Adam J. Levitt, Esq.  
Grant & Eisenhofer, P.A.  
30 North LaSalle Street, Ste. 1200  
Chicago, Illinois 60602  
[alevitt@gelaw.com](mailto:alevitt@gelaw.com)

Diane Zilka, Esq.  
Kyle J. McGee, Esq.  
Grant & Eisenhofer, P.A.  
123 Justison Street  
Wilmington, Delaware 19801  
[dzilka@gelaw.com](mailto:dzilka@gelaw.com)  
[kmcgee@gelaw.com](mailto:kmcgee@gelaw.com)

Stephen F. Taylor, Esq.  
Lemberg Law, LLC  
1100 Summer Street, 3rd Floor  
Stamford, Connecticut 06905  
[staylor@lembertglaw.com](mailto:staylor@lembertglaw.com)

*Attorneys for William Bridge and the  
Proposed Class*

Brian Roth, Esq.  
Sessions, Fishman, Nathan & Israel, L.L.C.  
3850 N. Causeway Blvd., Suite 200  
Metairie, LA 70002-7227  
[broth@sessions-law.biz](mailto:broth@sessions-law.biz)

*Attorneys for NCO Financial System*

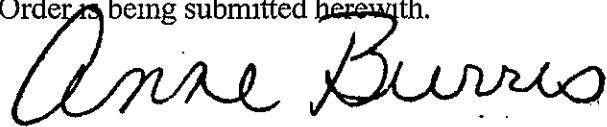
Patrick J. Reilly, Esq.  
Brian G. Anderson, Esq.  
R. Calder Huntington, Esq.  
Holland & Hart, LLP  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, Nevada 89134  
[preilly@hollandhart.com](mailto:preilly@hollandhart.com)  
[bganderson@hollandhart.com](mailto:bganderson@hollandhart.com)  
[rchuntington@hollandhart.com](mailto:rchuntington@hollandhart.com)

*Attorneys for Credit One Bank N.A.*

**PLEASE TAKE NOTICE** that upon the attached declaration of Patrick J. Reilly, dated April 27, 2015, and upon all other papers filed and proceedings had, the defendant will move this court at the James A. Byrne United States Court House, 601 Market Street, Philadelphia, Pennsylvania, for an order quashing the subpoena for the production of documents, served on NCO Financial Systems, Inc. on March 13, 2015 and dated March 12, 2015, pursuant to FRCP 45(d) on the ground that the subpoena is unreasonable and oppressive as more clearly appears in the declaration of Patrick J. Reilly, attached as Exhibit A.

**PLEASE TAKE FURTHER NOTICE** that the undersigned requests oral argument of the within Motion, if so desired by the Court.

A proposed form of Order is being submitted herewith.



Anne S. Burris, Esq.  
ASB - 0860  
Lindabury, McCormick, Estabrook & Cooper, P.C.  
Two Penn Center Plaza, Suite 200  
Philadelphia, PA 19102  
(215) 854-4090

*Attorneys for Defendant, Credit One Bank, N.A.*

Date: April 27, 2015